

## **ATTACHMENT J-2**

### **RESPONSE LETTERS ON NOTICE OF PREPARATION (NOP), RESPONSE LETTERS ON SUPPLEMENTAL NOP, RESPONSE LETTERS ON NOTICE OF INTENT (NOI)**

#### **RESPONSES TO THE SUPPLEMENTAL NOP**

This attachment contains the following responses to the 2007 Supplemental Notice of Preparation:

##### **Responses from Regional Agencies**

- Metropolitan Transportation Agency (August 27, 2007, 4 pages)
- Metropolitan Water District of Southern California (August 31, 2007, 18 pages)
- Santa Ana Watershed Project (August 20, 2007, 2 pages)
- Southern California Association of Governments (August 22, 2007, 7 pages)
- South Coast Air Quality Management District (August 3, 2007, 2 pages)

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**Metro**

Metropolitan Transportation Authority

One Gateway Plaza  
Los Angeles, CA 90012-2952MM  
213.922.2000 ext.  
metro.net

August 27, 2007

Ms. Cathy Bechtel  
Riverside County Transportation Commission  
4080 Lemon St, 3<sup>rd</sup> Floor  
Riverside, CA 92502-2208

RECEIVED  
AUG 29 2007  
RIVERSIDE COUNTY  
TRANSPORTATION COMMISSION

Dear Ms Bechtel:

Thank you for the opportunity to comment on the Supplemental Notice of Preparation (NOP) for the Mid County Parkway Draft EIR/EIS project. This letter conveys recommendations from the Los Angeles County Metropolitan Transportation Authority (Metro) concerning issues that are germane to our agency's statutory responsibilities in relation to the proposed project.

Regarding the categories covered under the Environmental Review Process there is no mention of addressing Global Climate Change impacts from the cumulative Greenhouse Gas emissions associated with the project.

1. The Attorney General of California is using recent legislation such as AB 32 to challenge agencies that have not addressed greenhouse gas reduction measures in their environmental impact reports. The Environmental Review Process should address Global Climate Change in the Project Description, Environmental Setting, Thresholds for Significance, Air Quality Impacts, Mitigation Measures, Cumulative Impacts and Alternatives sections. Rather than a likely legal challenge resulting in a delay and subsequent cost increase of the project, it would be best to reasonably address the Global Climate Change impacts in this report.

Regarding the Transportation/Traffic Category and Community Impacts under the Environmental Review Process, there has been a significant increase in truck traffic into and out of the inland empire as a result of increased industrialization and locating distribution centers for goods to service the growing population.

2. The project should include a detailed analysis and evaluation of existing and future truck transport in and out of the County, as this sector is likely to continue to grow exponentially and have a more significant affect on overall traffic conditions.

We believe the consideration of the above-mentioned issues will improve the quality and completeness of the document and avoid issues likely to impact the overall schedule for environmental clearance. Metro looks forward to reviewing the Draft

EIR/EIS. If you have any questions regarding this response, please call me at 213-922-6908 or by email at chapmanis@metro.net. Please send the Draft EIR/EIS to the following address:

Metro CEQA Review Coordination  
One Gateway Plaza MS 99-23-2  
Los Angeles, CA 90012-2952  
Attn: Susan Chapman

Sincerely,

A handwritten signature in black ink, appearing to read "Susan Chapman", with a long horizontal flourish extending to the right.

Susan Chapman  
Program Manager, CEQA Review Coordination  
Long Range Planning

*cc. Rob McLann  
Chron*

Metropolitan Transportation Authority

One Gateway Plaza  
Los Angeles, CA 90012-2952213.922.2000 Tel  
metro.net**Metro**81509 CB, GQ, MM,  
HS

August 27, 2007

Ms. Cathy Bechtel  
Riverside County Transportation Commission  
4080 Lemon St, 3<sup>rd</sup> Floor  
Riverside, CA 92502-2208

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EIR/EIS. If you have any questions regarding this response, please call me at 213-922-6908 or by email at chapmans@metro.net. Please send the Draft EIR/EIS to the following address:

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One Gateway Plaza MS 99-23-2  
Los Angeles, CA 90012-2952  
Attn: Susan Chapman

Sincerely,

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Susan Chapman  
Program Manager, CEQA Review Coordination  
Long Range Planning



**MWD**

METROPOLITAN WATER DISTRICT OF SOUTHERN CALIFORNIA

Executive Office

August 31, 2007

Via E-Mail

Ms. Cathy Bechtel  
Riverside County Transportation Commission  
4080 Lemon Street, 3<sup>rd</sup> Floor  
Riverside, CA 92502-2208

Dear Ms. Bechtel:

Supplemental Notice of Preparation for the Draft Environmental  
Impact Statement/Environmental Impact Report for the Mid County Parkway Corridor Project

The Metropolitan Water District of Southern California (Metropolitan) has reviewed the Supplemental Notice of Preparation (Supplemental NOP) for the Draft Environmental Impact Statement/Environmental Impact Report (Draft EIS/EIR) for the Mid County Parkway Corridor Project, located within western Riverside County. This letter contains Metropolitan's response to the Supplemental NOP as a potentially affected public agency.

Metropolitan currently owns and operates several facilities within the boundaries of the study area described in the Supplemental NOP, including Lake Mathews, the Colorado River Aqueduct, the Upper Feeder pipeline, the Lower Feeder pipeline, and the Lake Perris Bypass pipeline and pumpback facilities. In addition, Metropolitan's approved Central Pool Augmentation (CPA) pipeline and treatment plant are within or adjacent to the boundaries of the proposed study area. Furthermore, Metropolitan maintains ownership and jointly manages the Lake Mathews Multi-Species Habitat Conservation Plan/Natural Community Conservation Plan (MSHCP/NCCP) Reserve.

As discussed in our comments to your initial NOP, there are several critical issues that must be resolved before Metropolitan will consider granting approval for the crossing of our lands and/or facilities.

These issues include:

- Impacts to the Lake Mathews reserve lands, which includes the Lake Mathews MSHCP/NCCP Reserve;
- Impacts to the Lake Mathews watershed (e.g., impact to the quality of water entering Lake Mathews);
- Inclusion of the requirements stated in the Lake Mathews Drainage Water Quality Management Plan, a joint agreement between Metropolitan, the County of Riverside, and the Riverside County Flood Control and Water Conservation District;
- Impacts to Metropolitan operational facilities and rights-of-way; and
- Security issues.



Ms. Cathy Bechtel

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Metropolitan addressed these issues in detail in the attached letter to Cathy Bechtel, dated April 18, 2007, and in the attached letter to Rick Simon, dated July 31, 2007.

Metropolitan would also like clarification regarding the Riverside County Transportation Commission's "preferred alternative" for the Mid County Parkway, and clarification regarding the issue of the possible widening of Cajalco Road.

As previously stated, Metropolitan cannot support or sanction any alternative that enters or impacts the Lake Mathews MSHCP/NCCP. The lead agency, with Metropolitan's consent and overview, would need to review and assess the legal ramifications associated with modifications to the Lake Mathews MSHCP/NCCP, and determine the risks and benefits to Metropolitan. It is Metropolitan's understanding that the MSHCP/NCCP only allows for the adding of species or lands – not for changing or exchanging lands. Any changes to the MSHCP/NCCP and to existing legal documents establishing the reserve, including existing conservation easements, would require the approval by all members of the reserve management committee. As such, the lead agency would need to address the plausibility of modifying the MSHCP/NCCP given the constraints outlined in the legal documents that established the reserve.

Additionally, as set forth in our prior correspondence, Metropolitan has significant engineering issues related to the protection of our existing facilities and to the operation and maintenance of our water distribution system that is impacted by the various alternative alignments. These facilities are a critical part of Metropolitan's distribution system, which imports water to over 18 million customers in Southern California. Extensive engineering and geotechnical work will need to be undertaken to ensure that the location of the proposed corridor will not compromise the integrity of our distribution system, and will not restrict our ability to maintain, operate, add, or replace facilities along our right-of-way. There may also be situations where it is not possible to mitigate potential impacts to our facilities and a realignment of the corridor away from our facilities may be required.

We appreciate the opportunity to provide input to your planning process and we look forward to receiving future environmental documentation and the Draft EIR on this Project. If we can be of further assistance, please contact Mr. John Shama at (213) 217-6319.

Very truly yours,



*For* Delaine W. Shane  
Interim Manager, Environmental Planning Team

RM/rm  
(Public Folders/EPU/Letters/29-AUG-07B.doc – Cathy Bechtel)

Enclosures: Letter dated April 18, 2007  
Letter dated July 31, 2007





**MWD**

METROPOLITAN WATER DISTRICT OF SOUTHERN CALIFORNIA

Office of the General Counsel

April 18, 2007

*Via Electronic Mail & Federal Express*

Ms. Cathy Bechtel  
Riverside County  
Transportation Commission  
4080 Lemon Street, 3<sup>rd</sup> Floor  
Riverside, CA 92501

Re: Mid County Parkway Project

Dear Ms. Bechtel:

The Metropolitan Water District of Southern California (Metropolitan) is writing to comment on the Riverside County Transportation Commission's (RCTC) proposed alignments for its Mid County Parkway (MCP or project).

As you know, Metropolitan has worked cooperatively with RCTC on its consideration of alternative routes for, and environmental study of, the MCP. We understand that RCTC is preparing to issue its draft environmental impact report/environmental impact statement (Draft EIR/EIS) soon, and wanted to reiterate Metropolitan's comments and concerns regarding the project at this critical juncture. Enclosed and incorporated by reference are copies of prior correspondence that set forth Metropolitan's position on the project.

In summary, Metropolitan's primary concerns with the proposed MCP are:

- a. Impacts to Lake Mathews reserve lands and associated conservation, mitigation, and management pursuant to agreements with U.S. Fish and Wildlife Service, California Department of Fish and Game, and Riverside County Habitat Conservation Agency, including the Lake Mathews Multiple Species Habitat Conservation Plan/Natural Community Conservation Plan (MSHCP/NCCP or reserve).
- b. Impacts to the Lake Mathews watershed, including impacts to Metropolitan's Cajalco Creek Dam and adjunct detention basins and other existing and future facilities necessary to control urban runoff into Lake Mathews in order to meet water quality requirements. Any alignments within the Lake Mathews watershed should incorporate the existing requirements of the Lake Mathews Water Quality & Drainage Management Plan, which is an agreement that was executed between the Riverside County Flood Control and Water Conservation District and Metropolitan to preserve and enhance the water quality within Lake Mathews.

Ms. Bechtel

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- c. The protection of Metropolitan's existing large diameter distribution system and related facilities from potential impacts caused by the proposed MCP. The main facilities affected by these proposed alignments include: the Colorado River Aqueduct; Perris Valley Siphon Nos. 1 and 2; Lakeview pipeline; Bernasconi Tunnels Nos. 1 and 2; Inland Feeder; 1st Barrel Casa Loma Siphon; Upper Feeder pipeline; Lower Feeder pipeline; Temescal Power Plant; Lake Perris Bypass and its associated pipeline, Perris Power Plant and Pressure Control Facility; Lake Mathews and its associated power plant, dams and facilities; Chemical Unloading Facility; and the approved Central Pool Augmentation project and its associated future water treatment plant at Eagle Valley and the future water distribution system leaving Eagle Valley.
- d. Homeland security and related access issues to Metropolitan facilities, security gates, and detention basins in and around the proposed project.

Metropolitan requests that RCTC choose an alignment that addresses these concerns by avoiding any impacts to the reserve and operational lands, and by avoiding or minimizing impacts to Metropolitan's facilities. Based on a review of the preliminary data provided by RCTC, only Alternative 9 (the southernmost route) avoids the reserve, and has the fewest impacts on Metropolitan's facilities. Enclosed for reference is a map showing the proposed MCP alignments, including Alternative 9, in relation to the reserve and Metropolitan's major facilities.

#### **Impacts to the Reserve**

As we have stated repeatedly in the past, Metropolitan cannot support or sanction any alternative that enters or impacts the reserve in any way. The MSHCP/NCCP encompasses about 5,110 acres of land surrounding Lake Mathews, including the lands in the State Ecological Reserve. These lands are protected for their benefit to endangered, threatened or sensitive species and provide the basis for Endangered Species Act compliance for Metropolitan projects located in Riverside County.

To ensure protection of these lands, Metropolitan recorded a conservation easement that precludes the use of the property in a manner that could adversely affect its values for conservation purposes. Any activities or use of reserve lands for the MCP is incompatible with these conservation commitments, and Metropolitan is precluded from authorizing such activities and use of the reserve. For these reasons, Metropolitan opposes the MCP alignments that would enter and/or impact the reserve in any way.

Ms. Bechtel  
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**Impacts to Metropolitan Facilities**

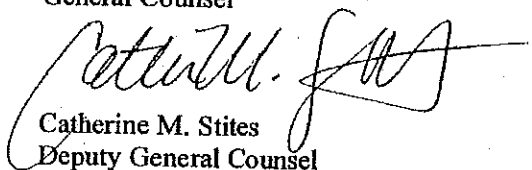
Metropolitan is also concerned about impacts to its facilities and their operation, as set forth in detail in the enclosed correspondence. In short, all of the proposed MCP alignments, including Alternative 9, would impact Metropolitan facilities. In addition, all alignments have the potential to affect how these facilities are operated. RCTC must carefully analyze the potential impacts, including but not limited to those from increased lateral and vertical loading, induced settlement, impacts to operations of the facilities, and altered drainage patterns. See, for example, the enclosed September 28, 2006 and March 29, 2007 correspondence for more detail on this subject. Any proposals to realign or accommodate Metropolitan's facilities, including the costs of such accommodations, are potentially significant and should be analyzed in detail by RCTC. We welcome the opportunity to provide information relevant to this analysis upon your request.

Metropolitan respectfully requests that you address all of the foregoing concerns in the Draft EIR/EIS. We look forward to continuing our cooperative work with RCTC on the MCP.

If you have any questions, please feel free to contact John Shamma at (213) 217-6409 or me at (213) 217-6533.

Sincerely,

Karen L. Tachiki  
General Counsel



Catherine M. Stites  
Deputy General Counsel

CMS/tjm  
Enclosures

cc: Mr. John Shamma, P.E., Metropolitan (w/o encls.)  
Mr. Hideo Sugita, RCTC Deputy Executive Director (w/encls.)

*THE METROPOLITAN WATER DISTRICT OF SOUTHERN CALIFORNIA*

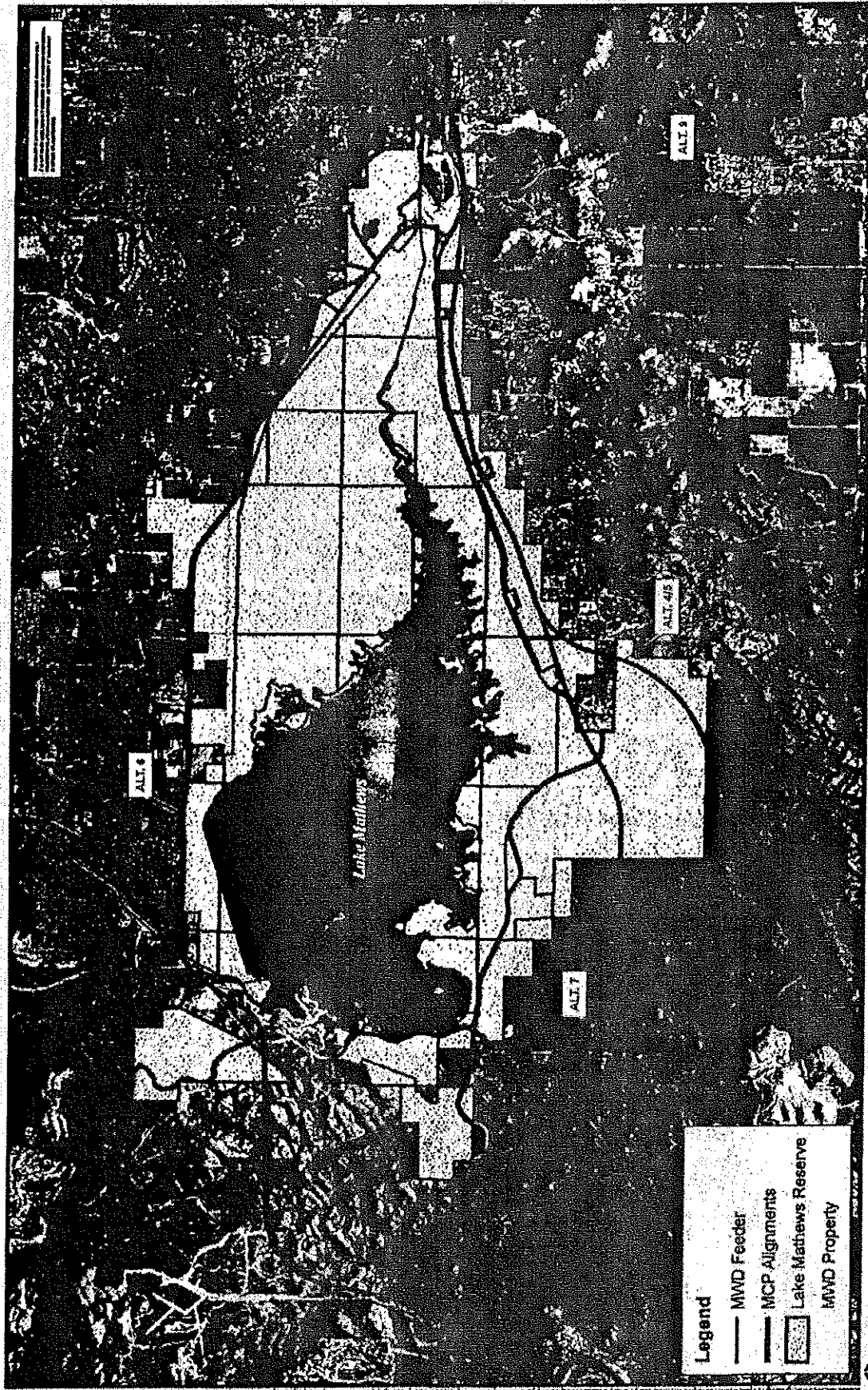
Ms. Bechtel  
Page 4  
April 18, 2007

cc: Merideth Cann, P.E. (w/encls.)  
Charles V. Landry, P.E. (w/encls.)  
Jacobs Engineering Group Inc.  
3850 Vine Street, Suite 120  
Riverside, CA 92507

Mr. Rob McCann (w/encls.)  
LSA Associates, Inc.  
20 Executive Park  
Suite 200  
Irvine, CA 92614

Karin Louise Watts Bazan, Esq. (w/encls.)  
Office of the Riverside County Counsel  
3535 10<sup>th</sup> Street, Suite 300  
Riverside, CA 92501





Mid County Parkway Alternatives  
Lake Mathews

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**MWD**

METROPOLITAN WATER DISTRICT OF SOUTHERN CALIFORNIA

Executive Office

MWD Colorado River Aqueduct  
Sta. 10899+00 to 11022+00  
Substr. Job No. 2001-06-008

July 31, 2007

Mr. Rick Simon  
CH2MHILL  
Suite 200  
2280 Market Street  
Riverside, CA 92501

Dear Mr. Simon:

Mid-County Parkway and State Route 79 Interchange

Thank you for your transmittal letter dated April 19, 2007, submitting a drawing (titled SR79 South, Cut and Fill, Mid-County Parkway Project) showing the proposed alignment and contours for the Mid-County Parkway Project and the State Route 79 Realignment Interchange Project in Riverside County.

Subsequently, we received a geotechnical report (Preliminary Geotechnical Evaluation, Metropolitan Water District, Canal Crossing Sites, State Route 79 Realignment Project, Riverside County, California) prepared by Ninyo & Moore, dated June 8, 2007.

The proposed Mid-County Parkway and State Route 79 (SR79) Realignment projects will potentially impact several of Metropolitan's facilities along their alignments. However, this letter specifically pertains to the interchange between the Mid-County

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Parkway and the realigned SR79, and a portion of the Mid-County Parkway immediately to the west of this interchange.

Metropolitan's 12-foot-4-inch-inside-diameter cast-in-place Colorado River Aqueduct Casa Loma Siphon First Barrel (CRA) is located immediately adjacent to, and south of, the Mid-County Parkway alignment, and is crossed by SR79 at its interchange with the Mid-County Parkway. Metropolitan's manholes, air release and blowoff structures are also located along this reach as indicated in Table 1.

The submitted drawing provides preliminary geometric design and grade information for the proposed Mid-County Parkway, the SR79 interchange, and the portion of the Mid-County Parkway westerly of this interchange to a few hundred feet west of Warren Road. The proposed interchange is located northeasterly of the intersection of the CRA Casa Loma Siphon First Barrel and Sanderson Avenue. The proposed alignment of the Mid-County Parkway westerly of the interchange is north of, and immediately adjacent to, the CRA Casa Loma Siphon right-of-way.

As proposed, the SR79 roadway will be elevated above the CRA and the portion of the Mid-County Parkway that extends easterly of the interchange to Ramona Expressway. The SR79 roadway will be elevated above existing grade by the construction of embankments to a height of about 25 feet directly above and adjacent to the CRA. The elevated SR79 will also require the use of bridge and pier structures adjacent to the CRA to allow the interchange transition roads to span over the CRA, although this information was not provided in the submittal. The Mid-County Parkway will be constructed above grade immediately parallel and adjacent to the north of the CRA right-of-way throughout the reach shown on the submitted drawing. This will be accomplished by the placement of approximately 25-foot-high embankments and the use of bridge structures to cross over roads that are not connected to the parkway. The Mid-County Parkway will also require the use of a retaining wall at the edge of the CRA right-of-way to support the roadway embankment between Sanderson Avenue and Cawston Avenue. The Mid-County Parkway Project will also require the relocation of Sanderson Avenue, the extension of two streets (Cawston Avenue and Odell Avenue) at existing grade across the CRA, and the construction of a new street (Bridge Street), which will be elevated above the Mid-County Parkway. At the west end of the submitted portion of the Mid-County Parkway Project, Warren Road will be realigned. Since Warren Road will be a connector road to

Mr. Rick Simon

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the Mid-County Parkway, a bridge structure with an approach embankment will be used to cross over the CRA to join the elevated Mid-County Parkway embankment.

We have reviewed your submitted drawing, and our general comments and requirements are as follows:

1. The proposed roadway embankments above and adjacent to the CRA, as shown on the submitted drawing, will subject the CRA to increased vertical loading. The original design and construction of the CRA did not anticipate the construction of projects like SR79 and the Mid-County Parkway. Therefore, the design of the SR79 realignment and Mid-County Parkway project must consider and mitigate for any and all impacts associated with increased vertical loads imposed on the CRA. Vertical loads of concern can be generated by construction, dead, live, and seismic loads. Depending upon the type and configuration of loading imposed on the CRA by new facilities, the CRA is unlikely to be able to accommodate the increased loading from a proposed facility if it exceeds the structural limit of the CRA. Table 2 indicates the specific locations of the Casa Loma Siphon First Barrel that was designed for live loads (road crossings) and dead loads only.

Please note that sufficient geotechnical exploration, testing, and analyses must be conducted to allow evaluation of the increased loads on the CRA. Geotechnical exploration for the design must also consider that protective systems and/or mitigation facilities associated with increased vertical loading might be required for the final design of the SR79 and Mid-County Parkway projects.

2. The construction of roadway embankments above and adjacent to the CRA may subject the CRA to settlement, which would be unacceptable. Depending upon the configuration and location of the embankments relative to the CRA, the CRA may be subject to lateral deformation as well. Please note that the imposition of lateral loads on our pipeline is not acceptable. As a result, roadway embankments planned to be built adjacent to the CRA right-of-way must consider possible deformation of the CRA caused by their construction. No embankments will be permitted within the limits of our right-of-way. Before the proposed development can be approved, a site-specific geotechnical report showing the predicted settlement of the CRA at 10-foot intervals, along with the method of settlement

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analysis, laboratory testing results and any other supporting documents, must be submitted. The three-dimensional configuration of the proposed grading and in-situ soils in terms of the actual size and varying depth of the fill, alluvium, etc., and depth of bedrock and ground water elevation must be collectively considered when determining the settlement along the alignment. The settlement calculation must be carried out at least 10 feet past the point of zero settlement in each direction. The possible settlement due to soil collapse (hydro-consolidation) must also be included in the geotechnical report.

The site-specific geotechnical report must also check slopes and fills affecting the pipeline for stability during an earthquake with an average return period of 475 years corresponding to a 10 percent chance of exceedance in 50 years.

The geotechnical analysis must also determine if lateral forces are imposed upon the CRA due to the new embankments proposed for the Mid-County Parkway. Please note that additional lateral forces on the siphon are not acceptable.

3. The submittal provided information on basic geometric design and some information regarding proposed site grades. However, the submittal did not provide information on anticipated structure locations and associated foundation types (shallow or deep). Since structure location and foundation type relative to the CRA will impact their design and acceptance, such information must be submitted with subsequent submittals. In addition these structures should be located such that they do not limit our ability to excavate our pipelines without shoring, for repair or replacement purposes.
4. Similar to the concerns associated with the construction of embankments adjacent to the CRA, structures and foundations proposed to be built above and near the CRA must not impose loads, vertical or lateral, onto the CRA or result in deformations to the CRA. No loads from the bridges may be imposed on the siphon. Please note that sufficient geotechnical exploration and testing, and geotechnical and structural analyses must be performed to demonstrate that structures and foundations constructed above and near the CRA will not have an adverse impact to the CRA by their construction and operation. We require that information on



Mr. Rick Simon

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new bridges and foundations near the pipeline be submitted to Metropolitan for review and approval.

5. The construction of roadways and embankments adjacent to the CRA right-of-way may result in trapped surface drainage along the CRA. To ensure that drainage of the CRA right-of-way is maintained and that water will not pond within or adjacent to the CRA, provisions for drainage must be included in the project design. In addition, Metropolitan must be able to dewater the CRA by discharging water into the drainage system. These drainage structures are listed in Table 1.
6. The geotechnical exploration, testing, and analyses program conducted to support the design of the SR79 and Mid-County Parkway projects must also consider the data needs to evaluate potential impacts to the CRA facilities, and to support design efforts for required structural and geotechnical mitigation.
7. The construction of the SR79 Extension and Mid-County Parkway projects must provide for the continuing operation and maintenance of the CRA, including access to the entire alignment of the CRA and all of its above ground facilities. The final design must include provisions to ensure this requirement.
8. Since this portion of the SR79 Extension and Mid-County Parkway projects is in the planning preliminary design stage, additional comments will likely be generated as the design process continues and progresses.

Besides the general criteria stated above, the following are Metropolitan's comments on specific features of the submitted design:

1. The main SR79 roadbed (Station 10928+00), two SR79 north bound off-ramps (Stations 10923+00 and 10923+90) and a south bound on-ramp (Station 10929+90) are proposed to be supported by embankments constructed directly above the CRA. This proposal is not acceptable to Metropolitan, and will need to be revised.

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2. The configuration and height of the proposed roadbed embankments adjacent to the CRA right-of-way will induce settlements and possibly lateral deformations of the CRA. Geotechnical borings drilled for the SR79 project indicate that soft, saturated clay soils exist in the upper 30 feet in the area of the interchange. Based upon the geometry and heights of the embankments adjacent to the CRA right-of-way, and the presence of the compressible clay soils, it is judged that the magnitude of induced deformations to the CRA, both total and differential settlement, and possibly lateral displacement, will be unacceptable. As a result, sufficient geotechnical exploration, testing, and analyses must accompany the final design of the interchange to evaluate potential deformation of the CRA and to demonstrate that proposed mitigation included in the final design is capable of preventing settlement and deformation of the CRA. Potential mitigation could include the incorporation of protective systems, increased bridge spans, or realignment and redesign to minimize or eliminate deformation of the CRA.
3. The submitted plan did not provide locations of foundations proposed for the interchange. Ultimately, this information will need to be submitted, since foundations for interchange structures (shallow and deep), including bridge abutments and piers, constructed near the CRA may impose loads (vertical and lateral) on the CRA, or induce settlement or deformations of the CRA. Sufficient analyses and supporting calculations must be provided to demonstrate that proposed structure and foundation locations and designs will not impose loads unto or induce deformation of the CRA. In general, adequate setbacks for structures and foundations are the best mitigation. At a minimum they should be located at such a depth that it does not interfere with Metropolitan's ability to excavate the CRA or install a possible additional pipeline within our right-of-way.

### **Mid-County Parkway**

#### **1. Main Roadway**

- The main roadway will be built on an approximately 25-foot-high, 100-foot-wide embankment that parallels the CRA between the SR79/Mid-County Parkway interchange and Warren Road. Although the main embankment is not being built directly above the CRA, based upon the

Mr. Rick Simon

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configuration of the embankment, its proximity to the CRA, and the geotechnical characteristics in the area, it is judged that ground deformations to the CRA could still result from the proposed Mid-County Parkway. Please note that sufficient geotechnical exploration, testing, and analyses must be conducted to evaluate potential deformation of the CRA and to demonstrate that the proposed alignment will not adversely impact the CRA with respect to settlement and lateral deformation.

- The side of the roadway embankment between the SR79/Mid-County Parkway interchange and the Cawston Avenue extension adjacent to the CRA right-of-way appears to be supported by a retaining wall. The potential impact of the proposed retaining structure, including its foundation, on the CRA must be evaluated. Please note that sufficient analyses and supporting calculations must be provided to demonstrate that the proposed retaining structure and its foundation will not adversely impact the CRA with respect to settlement and lateral deformation.
- The general drainage pattern in the area of the CRA is sheet flow, typically toward the San Jacinto River to the north. The construction of the Mid-County Parkway embankment adjacent to the CRA will likely disrupt significant portions of the current drainage patterns. Please note that project designs, with supporting calculations, must be provided to demonstrate that drainage patterns interrupted by the roadway embankment will be restored and modified properly to ensure that drainage of the CRA right-of-way is maintained and that ponding within or adjacent to the CRA right-of-way will not occur.

2. Bridge Street

Bridge Street as proposed near Station 10919+00 is not acceptable. If the roadway is at existing grade, a permanent cast-in-place concrete protective slab configured in accordance with Sketch SK-1, can be used to protect the aqueduct from additional vehicle loads. If the proposed roadway crossing over our property is elevated, it must span across our property with a bridge structure. The pipeline in this area should also be analyzed for settlement



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and deformation as a result of the placement of embankment adjacent to our right-of-way. Please note that permanent piles for protective systems, if utilized, must be installed in drilled holes. Driven piles may not be used within the limits of our right-of-way. There must be a minimum of 10 feet of clearance between the pipe and the edge of the drilled hole. The piles must not transfer any load to the siphon. This bridge should be designed such that there is a minimum of 22 feet of clearance between the bottom of the proposed bridge and the existing ground level.

3. Sanderson Avenue Relocation

A protective structure exists at the existing Sanderson Avenue crossing of the CRA (Sta. 10933+50). If the proposed at-grade crossing of Sanderson Avenue is relocated to Station 10937+90, protective measures to protect the aqueduct from vehicle loads must be constructed. A slab as described above can be used to protect the CRA from vehicle loads. Metropolitan's access should also be maintained across this street.

4. Cawston Avenue and Odell Avenue Extensions

- The proposed at-grade crossing of Cawston Avenue near Station 10964+50 is not acceptable. The proposed crossing requires protective measures to protect the CRA from vehicle loads. A slab as described above can be used for protection of the CRA
- The proposed at-grade crossing of Odell Avenue near Station 10992+00 is also not acceptable. There is an existing blowoff structure at Station 10992+10 at the proposed road crossing. We require that the road be relocated so that it does not disrupt Metropolitan's ability to access and operate this structure. In addition, construction of Odell Avenue requires protective measures to protect the aqueduct from vehicle loads. A slab as described above can be used for protection of the CRA at the Odell Avenue road crossing.



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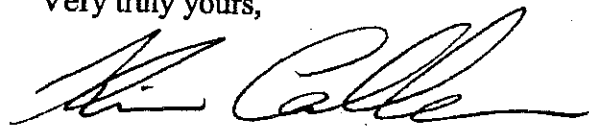
5. Warren Road – Mid-County Parkway Connection

The reconfiguration of Warren Road for its connection to the Mid-County Parkway spans the CRA with a bridge near Station 11017+50. The embankment located within the southern boundary of Metropolitan's right-of-way is not acceptable. This embankment must be moved outside of our right-of-way. Please note that sufficient analyses must be conducted to demonstrate that the proposed bridge abutment locations, and the approach ramp locations and configurations, will not adversely impact the CRA. Plans for the bridge, supports, and foundation must be submitted to Metropolitan for review and approval. In addition, we require a minimum of 20 feet of clearance between the existing ground level and the bottom of any bridge structure.

Facilities constructed within Metropolitan's fee properties and/or easements shall be subject to the paramount right of the Metropolitan to use its rights-of-way for the purpose for which they were acquired. If at any time Metropolitan or its assigns should, in the exercise of their rights, find it necessary to remove any of the facilities from its rights-of-way, such removal and replacement shall be at the expense of the owner of the facility.

For any further correspondence with Metropolitan relating to this project, please make reference to the Substructures Job Number located in the upper right-hand corner of this letter. Should you require any additional information, please contact Shoreh Zareh at (213) 217-6534.

Very truly yours,



Kieran M. Callanan, P.E.  
Manager, Substructures Team

SZ/ly  
DOC 2001-06-008-3  
Enclosure

*THE METROPOLITAN WATER DISTRICT OF SOUTHERN CALIFORNIA*

Mr. Rick Simon

Page 10

July 31, 2007

cc: Mr. Hideo Sugita  
Deputy Executive Director  
Riverside County  
Transportation Commission  
P.O. Box 12008  
Riverside, CA 92502-2208

## ATTACHMENT

### **Mid-County Parkway and SR79 Interchange MWD Colorado River Aqueduct**

**Table 1**

<b>Existing Structure</b>	<b>Station</b>
Manhole	10912+10
Manhole	10932+00
Blowoff structure	10943+14
Manhole	10952+10
Manhole	10972+10
Blowoff structure	10992+10
Blowoff structure	10997+10
Blowoff structure	11002+10
Air Valve structure	11006+70
Manhole	11012+00

**Table 2**

<b>From Station</b>	<b>To Station</b>	<b>Maximum Cover (ft)</b>	<b>Maximum Live Load</b>	<b>Description</b>
10899+00	10900+60	Existing only	GVW 8,000 lbs	Designed for DL only
10900+60	10901+36	6	AASHTO H20	Road Crossing: North Central Avenue
10901+36	10920+73	Existing only	GVW 8,000 lbs	Designed for DL only
10920+73	10921+49	6	AASHTO H20	Road Crossing: Central Avenue
10921+49	10932+97	Existing only	GVW 8,000 lbs	Designed for DL only
10932+97	10933+79	3-4	AASHTO H20	Road Crossing: Sanderson Avenue
10933+79	1019+79	Existing only	GVW 8,000 lbs	Designed for DL only
11019+79	11020+55	6	AASHTO H20	Road Crossing: Pico Road/Warren Road
11020+55	11022+00	Existing only	GVW 8,000 lbs	Designed for DL only

*Note: DL = dead load*

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SAWPA

# Santa Ana Watershed Project

81495 CB,

MM, GQ,

RECEIVED  
AUG 24 2007

RIVERSIDE COUNTY  
TRANSPORTATION COMMISSION

August 20, 2007

Ms. Cathy Bechtel  
Riverside County Transportation Commission  
4080 Lemon Street, 3<sup>rd</sup> Floor  
P.O. Box 12008  
Riverside, CA 92502

Ron Sullivan  
Commission  
Chair

Celeste Cantú  
General  
Manager

**Subject: Supplemental Notice of Preparation for the Draft EIR/EIS  
Mid County Parkway Project, SCH#2004111103**

Dear Ms. Bechtel:

Eastern  
Municipal  
Water  
District

We appreciate the opportunity to comment on the Supplemental Notice of Preparation for the Draft EIR/EIS for the Mid County Parkway Project, SCH#2004111103.

Inland  
Empire  
Utilities  
Agency

The Santa Ana Watershed Project Authority (SAWPA) operates an important brine disposal system in the upper Santa Ana Watershed. The Santa Ana Regional Interceptor (SARI) line provides both sewer services and a means of disposing of the brine created when desalters convert salty groundwater to drinking water. This piece of infrastructure is essential in the provision of drinking water throughout the region.

Orange  
County  
Water  
District

Proposed project areas near the intersection of Cajalco Road and Interstate 15 may impact the operation of the SARI line as an important portion of the SARI serving the Lake Elsinore area runs east of Interstate 15. The maps presented are not sufficiently detailed to show specific areas where the proposed project crosses the SARI, but it is apparent from the descriptive material that these crossings will occur.

San  
Bernardino  
Valley  
Municipal  
Water  
District

When developing final roadway alignments, it is necessary to consider impacts to the SARI system. SAWPA staff will provide detailed drawings and any assistance necessary to protect the SARI system during the construction and operation of the proposed project.

Western  
Municipal  
Water  
District

Please contact David Ruhl, Senior Project Manager ([druhl@sawpa.org](mailto:druhl@sawpa.org)) for further information and assistance as the proposed project moves forward.

Sincerely,  
Santa Ana Watershed Project Authority

  
Celeste Cantú  
General Manager

C: Rich Haller, SAWPA  
David Ruhl, SAWPA

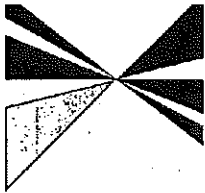
Attachment: SARI Reach V Map







P2302



**ASSOCIATION OF  
GOVERNMENTS**

**Main Office**

818 West Seventh Street

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[www.scag.ca.gov](http://www.scag.ca.gov)

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Riverside County: Jeff Stone, Riverside County • Thomas Buckley, Lake Elsinore • Bonnie Flickinger, Moreno Valley • Ron Loveridge, Riverside • Greg Pettis, Cathedral City • Ron Roberts, Temecula

San Bernardino County: Gary Ovitt, San Bernardino County • Lawrence Dale, Barstow • Paul Eaton, Montclair • Lee Ann Garcia, Grand Terrace • Tim Jasper, Town of Apple Valley • Larry McCallon, Highland • Deborah Robertson, Rialto • Alan Wagner, Ontario

Tribal Government Representative: Andrew Masel Sr., Pechanga Band of Luiseno Indians

Ventura County: Linda Parks, Ventura County • Glen Becerra, Simi Valley • Carl Morehouse, San Buenaventura • Toni Young, Port Hueneme

Orange County Transportation Authority: Art Brown, Buena Park

Riverside County Transportation Commission: Robin Lowe, Hemet

Ventura County Transportation Commission: Keith Millhouse, Moorpark

6/21/07

81504 CB,  
GQ, MM

RECEIVED  
AUG 27 2007

RIVERSIDE COUNTY  
TRANSPORTATION COMMISSION

August 22, 2007

Ms. Cathy Bechtel  
Riverside County Transportation Commission  
4080 Lemon Street, 3<sup>rd</sup> Floor  
Riverside, Ca. 92502-2208

RE: SCAG Comments on the Supplemental Notice of Preparation of a Draft  
Environmental Impact Report for Mid County Parkway - SCAG No. I20070481

Dear Ms. Bechtel,

Thank you for submitting the Notice of Preparation (NOP) of a Draft Environmental Impact Report (DEIR) for the Mid County Parkway - SCAG No. I20070481, to the Southern California Association of Governments (SCAG) for review and comment. As the clearinghouse for regionally significant projects per Executive Order 12372, SCAG reviews the consistency of local plans, projects, and programs with regional plans. This activity is based on SCAG's responsibilities as a regional planning organization pursuant to state and federal laws and regulations. Guidance provided by these reviews is intended to assist local agencies and project sponsors to take actions that contribute to the attainment of regional goals and policies.

SCAG staff has reviewed the aforementioned NOP and has determined that the proposed project is regionally significant per the California Environmental Quality Act (CEQA) Guidelines (Section 15125(d) and 15206). The Mid County Parkway is a proposed 32-mile transportation corridor that will relieve traffic congestion for east-west travel in western Riverside County between the San Jacinto and Corona areas. CEQA requires that EIR's discuss any inconsistencies between the proposed project and applicable general plans and regional plans (Section 15125 [d]). If there are inconsistencies, an explanation and rationalization for such inconsistencies should be provided.

We expect the DEIR to specifically cite all SCAG policies and address the manner in which the project is consistent, not-consistent, or not applicable to these policies, and provide supportive analysis as to why it is consistent, not-consistent, or not applicable to these policies. Policies of SCAG's Regional Comprehensive Plan and Guide (RCPG), Regional Transportation Plan (RTP), and Compass Growth Vision (CGV) that may be applicable to your project are outlined in the attachment. Also, for ease of review, we would encourage you to use a side-by-side comparison of all SCAG policies with a discussion of the consistency, non-consistency or not applicable of the policy and supportive analysis in a table format (attached). The RCPG, RTP and CGV can be found on the SCAG web site at: <http://scag.ca.gov/igr>

Please provide a minimum of 45 days for SCAG to review the DEIR when this document is available. If you have any questions regarding the attached comments, please contact James R Tebbetts at (213) 236-1915. Thank you.

Sincerely,

*Jonathan Mueller for J. Lieb*  
Jacob Lieb  
Manager, Environmental Division

DOCS# 139203v1



**COMMENTS ON THE NOTICE OF PREPARATION OF A DRAFT ENVIRONMENTAL  
 IMPACT REPORT FOR THE MID COUNTY PARKWAY - SCAG No. I20070481**

**PROJECT DESCRIPTION**

The Mid County Parkway is a proposed 32-mile transportation corridor that will relieve traffic congestion for east-west travel in western Riverside County between the San Jacinto and Corona areas and help address future transportation needs through 2035. The project proposes 9 location alternatives. The project will provide for connections to SR 79 in the east, I-215 in the center, and I-15 to the west. The project area is generally centered (north and south) on Cajalco Road on the west and Ramona Expressway on the east. The project area runs, from the west to the east, in the Temescal Wash, Lake Mathews, Mead Valley, Perris, and San Jacinto areas of Riverside County.

**CONSISTENCY WITH REGIONAL COMPREHENSIVE PLAN AND GUIDE POLICIES**

The **Growth Management Chapter (GMC)** of the Regional Comprehensive Plan and Guide (RCPG) contains the following policies that are particularly applicable and should be addressed in the DEIR for the Mid Valley Parkway Project.

- 3.01 *The population, housing, and jobs forecasts, which are adopted by SCAG's Regional Council and that reflect local plans and policies shall be used by SCAG in all phases of implementation and review.*

**Regional Growth Forecasts**

The DEIR should reflect the most current, adopted SCAG forecasts, which are the 2004 RTP (April 2004) Population, Household and Employment forecasts. It should be noted that SCAG is currently updating these forecasts, and depending on the timing, you may wish to add these updated forecasts. The adopted forecasts for your region, subregion, adjoining un-incorporated area, and cities are as follows:

**Adopted SCAG Regionwide Forecasts**

	<b>2010</b>	<b>2015</b>	<b>2020</b>	<b>2025</b>	<b>2030</b>
Population	19,208,661	20,191,117	21,137,519	22,035,416	22,890,797
Households	6,072,578	6,463,402	6,865,355	7,263,519	7,660,107
Employment	8,729,192	9,198,618	9,659,847	10,100,776	10,527,202

**Adopted WRCOG Forecasts**

	<b>2010</b>	<b>2015</b>	<b>2020</b>	<b>2025</b>	<b>2030</b>
Population	1,614,605	1,830,421	2,037,129	2,230,185	2,413,467
Households	521,606	606,139	691,621	776,168	860,168
Employment	541,587	633,161	727,005	822,031	918,640

**Adopted WROG Unincorporated Riverside County Forecasts**

	<b>2010</b>	<b>2015</b>	<b>2020</b>	<b>2025</b>	<b>2030</b>
Population	475,002	575,248	667,930	751,712	830,191
Households	156,466	195,665	235,183	274,346	313,281
Unicorp. Total	98,385	130,674	163,253	195,966	228,887

**Adopted City of Corona Forecasts**

	2010	2015	2020	2025	2030
Population	148,437	154,421	160,320	165,973	171,395
Households	44,428	47,092	49,814	52,504	55,203
Total	72,527	76,285	80,173	84,132	88,186

**Adopted City of Riverside Forecasts**

	2010	2015	2020	2025	2030
Population	307,847	323,384	338,712	353,397	367,489
Households	99,044	106,353	113,785	121,149	128,492
Total	163,771	181,120	199,078	217,369	236,081

**Adopted City of Perris Forecasts**

	2010	2015	2020	2025	2030
Population	63,440	70,014	76,501	82,719	88,683
Households	16,605	18,539	20,499	22,438	24,362
Total	16,652	19,892	23,249	26,666	30,168

**Adopted City of Moreno Valley Forecasts**

	2010	2015	2020	2025	2030
Population	169,895	187,816	205,503	222,451	238,703
Households	47,295	53,364	59,515	65,591	71,619
Total	46,416	56,143	66,221	76,485	86,993

**Adopted City of San Jacinto Forecasts**

	2010	2015	2020	2025	2030
Population	31,256	34,247	37,197	40,025	42,738
Households	11,047	12,284	13,541	14,782	16,016
Total	8,587	9,313	10,066	10,834	11,620

**Adopted City of Hemet Forecasts**

	2010	2015	2020	2025	2030
Population	105,100	121,911	138,496	154,392	169,636
Households	45,449	53,293	61,237	69,071	76,836
Total	31,656	36,924	42,384	47,942	53,629

\* The 2004 RTP growth forecast at the regional, county and subregional level was adopted by RC in April, 2004. City totals are the sum of small area data and should be used for advisory purposes only.

3.03 *The timing, financing, and location of public facilities, utility systems, and transportation systems shall be used by SCAG to implement the region's growth policies*

**GMC POLICIES RELATED TO THE RCPG GOAL TO IMPROVE THE REGIONAL STANDARD OF LIVING**

The Growth Management goals to develop urban forms that enable individuals to spend less income on housing cost, that minimize public and private development costs, and that enable firms to be more competitive; strengthen the regional strategic goal to stimulate the regional economy. The evaluation of the proposed project in relation to the following policies would be intended to guide efforts toward achievement of such goals and does not infer regional interference with local land use powers.



- 3.05 Encourage patterns of urban development and land use which reduce costs on infrastructure construction and make better use of existing facilities.
- 3.09 Support local jurisdictions' efforts to minimize the cost of infrastructure and public service delivery, and efforts to seek new sources of funding for development and the provision of services.
- 3.10 Support local jurisdictions' actions to minimize red tape and expedite the permitting process to maintain economic vitality and competitiveness.

#### **GMC POLICIES RELATED TO THE RCPG GOAL TO IMPROVE THE REGIONAL QUALITY OF LIFE**

The Growth Management goals to attain mobility and clean air goals and to develop urban forms that enhance quality of life, that accommodate a diversity of life styles, that preserve open space and natural resources, and that are aesthetically pleasing and preserve the character of communities, enhance the regional strategic goal of maintaining the regional quality of life. The evaluation of the proposed project in relation to the following policies would be intended to provide direction for plan implementation, and does not allude to regional mandates.

- 3.11 Support provisions and incentives created by local jurisdictions to attract housing growth in job-rich subregions and job growth in housing-rich subregions.
- 3.12 Encourage existing or proposed local jurisdictions' programs aimed at designing land uses which encourage the use of transit and thus reduce the need for roadway expansion, reduce the number of auto trips and vehicle miles traveled, and create opportunities for residents to walk and bike.
- 3.13 Encourage local jurisdictions' plans that maximize the use of existing urbanized areas accessible to transit through infill and redevelopment.
- 3.14 Support local plans to increase density of future development located at strategic points along the regional commuter rail, transit systems, and activity centers.
- 3.15 Support local jurisdictions' strategies to establish mixed-use clusters and other transit-oriented developments around transit stations and along transit corridors.
- 3.16 Encourage developments in and around activity centers, transportation corridors, underutilized infrastructure systems, and areas needing recycling and redevelopment.
- 3.17 Support and encourage settlement patterns, which contain a range of urban densities.
- 3.18 Encourage planned development in locations least likely to cause adverse environmental impact.
- 3.19 Support policies and actions that preserve open space areas identified in local, state, and federal plans.
- 3.20 Support the protection of vital resources such as wetlands, groundwater recharge areas, woodlands, production lands, and land containing unique and endangered plants and animals.
- 3.21 Encourage the implementation of measures aimed at the preservation and protection of recorded and unrecorded cultural resources and archaeological sites.
- 3.22 Discourage development, or encourage the use of special design requirements, in areas with steep slopes, high fire, flood, and seismic hazards.
- 3.23 Encourage mitigation measures that reduce noise in certain locations, measures aimed at preservation of biological and ecological resources, measures that would reduce exposure to seismic hazards, minimize earthquake damage, and to develop emergency response and recovery plans.

#### **AIR QUALITY CHAPTER**

The Air Quality Chapter core actions related to the proposed project include:



- 5.07 *Determine specific programs and associated actions needed (e.g., indirect source rules, enhanced use of telecommunications, provision of community-based shuttle services, provision of demand management based programs, or vehicle-miles-traveled/emission fees) so that options to command and control regulation can be assessed.*
- 5.11 *Through the environmental document review process, ensure that plans at all levels of government (regional, air basin, county, subregional, and local) consider air quality, land use, transportation, and economic relationships to ensure consistency and minimize conflicts.*

#### **OPEN SPACE AND CONSERVATION CHAPTER**

The Open Space and Conservation Chapter goals related to the proposed project include:

- 9.1 *Provide adequate land resources to meet the outdoor recreation needs of the present and future residents in the region and to promote tourism in the region.*
- 9.2 *Increase the accessibility to open space lands for outdoor recreation.*
- 9.3 *Promote self-sustaining regional recreation resources and facilities.*
- 9.4 *Maintain open space for adequate protection to lives and properties against natural and manmade hazards.*
- 9.5 *Minimize potentially hazardous developments in hillsides, canyons, areas susceptible to flooding, earthquakes, wildfire and other known hazards, and areas with limited access for emergency equipments.*
- 9.6 *Minimize public expenditure for infrastructure and facilities to support urban type uses in areas where public health and safety could not be guaranteed.*
- 9.7 *Maintain adequate viable resource production lands, particularly lands devoted to commercial agriculture and mining operations.*
- 9.8 *Develop well-managed viable ecosystems or known habitats of rare, threatened and endangered species, including wetlands.*

#### **REGIONAL TRANSPORTATION PLAN**

The 2004 Regional Transportation Plan (RTP) also has goals and policies that are pertinent to this proposed project. This RTP links the goal of sustaining mobility with the goals of fostering economic development, enhancing the environment, reducing energy consumption, promoting transportation-friendly development patterns, and encouraging fair and equitable access to residents affected by socio-economic, geographic and commercial limitations. The RTP continues to support all applicable federal and state laws in implementing the proposed project. Among the relevant goals and policies of the RTP are the following:

##### **Regional Transportation Plan Goals**

- RTP G1 *Maximize mobility and accessibility for all people and goods in the region.*
- RTP G2 *Ensure travel safety and reliability for all people and goods in the region.*
- RTP G3 *Preserve and ensure a sustainable regional transportation system.*
- RTP G4 *Maximize the productivity of our transportation system.*
- RTP G5 *Protect the environment, improve air quality and promote energy efficiency.*
- RTP G6 *Encourage land use and growth patterns that complement our transportation investments.*

##### **Regional Transportation Plan Policies**

- RTP P1 *Transportation investments shall be based on SCAG's adopted Regional Performance Indicators.*

### **GROWTH VISIONING**

The fundamental goal of the Compass Growth Visioning effort is to make the SCAG region a better place to live, work and play for all residents regardless of race, ethnicity or income class. Thus, decisions regarding growth, transportation, land use, and economic development should be made to promote and sustain for future generations the region's mobility, livability and prosperity. The following "Regional Growth Principles" are proposed to provide a framework for local and regional decision making that improves the quality of life for all SCAG residents. Each principle is followed by a specific set of strategies intended to achieve this goal.

*Principle 1: Improve mobility for all residents*

*GV P1.1 Encourage transportation investments and land use decisions that are mutually supportive.*

*GV P1.2 Locate new housing near existing jobs and new jobs near existing housing.*

*Principle 3: Enable prosperity for all people*

*GV P3.3 Ensure environmental justice regardless of race, ethnicity or income class.*

*GV P3.4 Support local and state fiscal policies that encourage balanced growth.*

*GV P3.5 Encourage civic engagement.*

*Principle 4: Promote sustainability for future generations*

*GV P4.1 Preserve rural, agricultural, recreational and environmentally sensitive areas.*

*GV P4.3 Develop strategies to accommodate growth that uses resources efficiently, eliminate pollution and significantly reduce waste.*

*GV P4.4 Utilize "green" development techniques*

### **GENERAL COMMENT**

SCAG is in the process of updating the RTP and RCPG. Depending on the timeframe for adoption of the Mid County Parkway, updated policies and population, household, and employment forecasts found in the RTP and RCPG might be incorporated into the DRP.

### **CONCLUSION**

All feasible measures needed to mitigate any potentially negative regional impacts associated with the proposed project should be implemented and monitored, as required by CEQA.

**Suggested Side by Side Format - Comparison Table of SCAG Policies**

For ease of review, we would encourage the use of a side-by-side comparison of all SCAG policies with a discussion of the consistency, non-consistency or not applicable of the policy and supportive analysis in a table format. All policies and goals must be evaluated as to impacts. Suggest format is as follows:

SCAG RCPG (RTP and/or CGV) Policies Growth Management Chapter		
Policy Number	Policy Text	Statement of Consistency, Non-Consistency, or Not Applicable
3.01	<i>The population, housing, and jobs forecasts, which are adopted by SCAG's Regional Council and that reflect local plans and policies shall be used by SCAG in all phases of implementation and review.</i>	Consistent: Statement as to why Not-Consistent: Statement as to why Not Applicable: Statement as to why
3.02	<i>In areas with large seasonal population fluctuations, such as resort areas, forecast permanent populations. However, appropriate infrastructure systems should be sized to serve high-season population totals.</i>	Consistent: Statement as to why Not-Consistent: Statement as to why Not Applicable: Statement as to why
3.03	<i>The timing, financing, and location of public facilities, utility systems, and transportation systems shall be used by SCAG to implement the region's growth policies.</i>	Consistent: Statement as to why Not-Consistent: Statement as to why Not Applicable: Statement as to why
Etc.	Etc.	Etc.

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81343 CB, GQ,  
MM, HS



**South Coast  
Air Quality Management District**

21865 Copley Drive, Diamond Bar, CA 91765-4182  
(909) 396-2000 • [www.aqmd.gov](http://www.aqmd.gov)

**RECEIVED**  
AUG 10 2007

RIVERSIDE COUNTY  
TRANSPORTATION COMMISSION

August 3, 2007

Ms. Cathy Bechtel  
Riverside County Transportation Commission  
4080 Lemon Street, 3<sup>rd</sup> Floor  
P.O. Box 12008  
Riverside, CA 92502-2208

Dear Ms. Bechtel:

**Notice of Preparation of a Draft Supplemental Environmental Impact Report (Draft  
SEIR) for the  
Mid County Parkway**

The South Coast Air Quality Management District (SCAQMD) appreciates the opportunity to comment on the above-mentioned document. The SCAQMD's comments are recommendations regarding the analysis of potential air quality impacts from the proposed project that should be included in the draft supplemental environmental impact report (SEIR). Please send the SCAQMD a copy of the Draft SEIR upon its completion. **In addition, please send with the draft SEIR all appendices or technical documents related to the air quality analysis and electronic versions of all air quality modeling and health risk assessment files. Without all files and supporting air quality documentation, the SCAQMD will be unable to complete its review of the air quality analysis in a timely manner. Any delays in providing all supporting air quality documentation will require additional time for review beyond the end of the comment period.**

**Air Quality Analysis**

The SCAQMD adopted its California Environmental Quality Act (CEQA) Air Quality Handbook in 1993 to assist other public agencies with the preparation of air quality analyses. The SCAQMD recommends that the Lead Agency use this Handbook as guidance when preparing its air quality analysis. Copies of the Handbook are available from the SCAQMD's Subscription Services Department by calling (909) 396-3720. Alternatively, the lead agency may wish to consider using the California Air Resources Board (CARB) approved URBEMIS 2007 Model. This model is available on the SCAQMD Website at: [www.aqmd.gov/ceqa/models.html](http://www.aqmd.gov/ceqa/models.html).

The Lead Agency should identify any potential adverse air quality impacts that could occur from all phases of the project and all air pollutant sources related to the project. Air quality impacts from both construction (including demolition, if any) and operations should be calculated. Construction-related air quality impacts typically include, but are not limited to, emissions from the use of heavy-duty equipment from grading, earth-loading/unloading, paving, architectural coatings, off-road mobile sources (e.g., heavy-duty construction equipment) and on-road mobile sources (e.g., construction worker vehicle trips, material transport trips). Operation-related air quality impacts may include, but are not limited to, emissions from stationary sources (e.g., boilers), area sources (e.g., solvents and coatings), and vehicular trips (e.g., on- and off-road tailpipe emissions and entrained dust). Air quality impacts from indirect sources, that is, sources that generate or attract vehicular trips should be included in the analysis.

The SCAQMD has developed a methodology for calculating PM<sub>2.5</sub> emissions from construction and operational activities and processes. In connection with developing PM<sub>2.5</sub> calculation methodologies, the SCAQMD has also developed both regional and localized significance thresholds. The SCAQMD requests that the lead agency quantify PM<sub>2.5</sub> emissions and compare the results to the recommended PM<sub>2.5</sub> significance thresholds. Guidance for



calculating PM2.5 emissions and PM2.5 significance thresholds can be found at the following internet address:  
[http://www.aqmd.gov/ceqa/handbook/PM2\\_5/PM2\\_5.html](http://www.aqmd.gov/ceqa/handbook/PM2_5/PM2_5.html).

In addition to analyzing regional air quality impacts the SCAQMD recommends calculating localized air quality impacts and comparing the results to localized significance thresholds (LSTs). LST's can be used in addition to the recommended regional significance thresholds as a second indication of air quality impacts when preparing a CEQA document. Therefore, when preparing the air quality analysis for the proposed project, it is recommended that the lead agency perform a localized significance analysis by either using the LSTs developed by the SCAQMD or performing dispersion modeling as necessary. Guidance for performing a localized air quality analysis can be found at <http://www.aqmd.gov/ceqa/handbook/LST/LST.html>.

It is recommended that lead agencies for projects generating or attracting vehicular trips, especially heavy-duty diesel-fueled vehicles, perform a mobile source health risk assessment. Guidance for performing a mobile source health risk assessment ("Health Risk Assessment Guidance for Analyzing Cancer Risk from Mobile Source Diesel Idling Emissions for CEQA Air Quality Analysis") can be found on the SCAQMD's CEQA web pages at the following internet address: [http://www.aqmd.gov/ceqa/handbook/mobile\\_toxic/mobile\\_toxic.html](http://www.aqmd.gov/ceqa/handbook/mobile_toxic/mobile_toxic.html). An analysis of all toxic air contaminant impacts due to the decommissioning or use of equipment potentially generating such air pollutants should also be included.

#### Mitigation Measures

In the event that the project generates significant adverse air quality impacts, CEQA requires that all feasible mitigation measures that go beyond what is required by law be utilized during project construction and operation to minimize or eliminate significant adverse air quality impacts. To assist the Lead Agency with identifying possible mitigation measures for the project, please refer to Chapter 11 of the SCAQMD CEQA Air Quality Handbook for sample air quality mitigation measures. Additional mitigation measures can be found on the SCAQMD's CEQA web pages at the following internet address: [www.aqmd.gov/ceqa/handbook/mitigation/MM\\_intro.html](http://www.aqmd.gov/ceqa/handbook/mitigation/MM_intro.html). Additionally, SCAQMD's Rule 403 – Fugitive Dust, and the Implementation Handbook contain numerous measures for controlling construction-related emissions that should be considered for use as CEQA mitigation if not otherwise required. Other measures to reduce air quality impacts from land use projects can be found in the SCAQMD's Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning. This document can be found at the following internet address: <http://www.aqmd.gov/prdas/agguide/agguide.html>. In addition, guidance on siting incompatible land uses can be found in the California Air Resources Board's Air Quality and Land Use Handbook: A Community Perspective, which can be found at the following internet address: <http://www.arb.ca.gov/ch/handbook.pdf>. Pursuant to state CEQA Guidelines §15126.4 (a)(1)(D), any impacts resulting from mitigation measures must also be discussed.

#### Data Sources

SCAQMD rules and relevant air quality reports and data are available by calling the SCAQMD's Public Information Center at (909) 396-2039. Much of the information available through the Public Information Center is also available via the SCAQMD's World Wide Web Homepage (<http://www.aqmd.gov>).

The SCAQMD is willing to work with the Lead Agency to ensure that project-related emissions are accurately identified, categorized, and evaluated. Please call Charles Blankson, Ph.D., Air Quality Specialist, CEQA Section, at (909) 396-3304 if you have any questions regarding this letter.

Sincerely,



Steve Smith, Ph.D.

Program Supervisor, CEQA Section

Planning, Rule Development and Area Sources

SS:CB:LI

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